

**UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TENNESSEE
NORTHERN DIVISION**

STEVEN MARANDOLA,

Plaintiff,

v.

AVERTIUM HOLDINGS, LLC,
AVERTIUM, LLC, and AVERTIUM
TENNESSEE, INC.,

Defendants.

Case No. 3:25-cv-00084-KAC-DCP

District Judge Crytzer

Magistrate Judge Poplin

CORPORATE DISCLOSURE STATEMENT

Defendants Avertium Holdings, LLC, Avertium, LLC, and Avertium Tennessee, Inc., by and through their undersigned counsel, make the following disclosures pursuant to Federal Rule of Civil Procedure 7.1(a)(1) and (2).

Defendant Avertium Tennessee, Inc. is a Delaware corporation with its principal place of business in Knoxville, Tennessee. Avertium Tennessee, Inc. is wholly owned by Avertium Companies, Inc.

Defendant Avertium, LLC is a limited liability company organized under the laws of Delaware. The sole member of Avertium, LLC is Avertium Holdings, LLC.

Defendant Avertium Holdings, LLC is a limited liability company organized under the laws of Delaware. Except for Sunstone MSSP Aggregator, LLC, which owns approximately 68% of the ownership interests of Avertium Holdings, LLC, there is no parent corporation or any publicly held corporation that owns 10% or more of stock. The members of Avertium Holdings, LLC are:

1. Bart Erwin, who is a citizen of Ohio;
2. GG Investment, LLC, which is a limited liability company organized under the laws of Delaware. The members of GG Investment, LLC are:

- a. Greg Breetz, who is a citizen of Tennessee; and
- b. Ginger Le Ford Duncan, who is a citizen of Tennessee;
3. Hidalgo Partners Holdings, Inc., which is a Texas corporation with its principal place of business in Dallas, Texas;
4. Holden Kilbride, who is a citizen of Arizona;
5. Holly Young, who is a citizen of Tennessee;
6. Jeff Schmidt, who is a citizen of Georgia;
7. John McNeely, who is a citizen of Tennessee;
8. Margie Dyer, who is a citizen of Tennessee;
9. Plumtree Partners, LLC, which is a limited liability company organized under the laws of Delaware. The sole member of Plumtree Partners, LLC is Jeff Rich, who is a citizen of Texas;
10. Scott Hrastar, who is a citizen of Georgia;
11. Stuart Scholly, who is a citizen of Illinois;
12. Sunstone MSSP Aggregator, LLC, which is a limited liability company organized under the laws of Delaware and a disregarded entity for tax purposes. The sole member of Sunstone MSSP Aggregator, LLC is Sunstone Partners I AIV B, L.P., which is a limited partnership organized under the laws of Delaware;
13. Vasko TV Holdings, Inc., which is an Arizona corporation with its principal place of business in Phoenix, Arizona;
14. Vicente Velez, who is a citizen of New Jersey;
15. William Carroll, who is a citizen of Michigan.

Date: May 22, 2025

Respectfully submitted,

/s/ Benjamin S. Morrell

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Counsel for Defendants

CERTIFICATE OF SERVICE

I hereby certify that on the date listed below, I filed the foregoing document with the Clerk of the Court using the Court's CM/ECF filing system, which will send notice of such filing to all counsel of record.

Date: May 22, 2025

/s/ Benjamin S. Morrell